

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN

EPIC SYSTEMS CORPORATION, a
Wisconsin Corporation,

Plaintiff,

Case No. 14-CV-748

v.

TATA CONSULTANCY SERVICES
LIMITED, an Indian Corporation; and TATA
AMERICA INTERNATIONAL
CORPORATION (dba TCS AMERICA), a
New York Corporation,

Defendants.

**PLAINTIFF'S NOTICE OF MOTION AND EMERGENCY MOTION FOR A
PROTECTIVE ORDER RE TCS'S COUNTERCLAIM DISCOVERY**

Plaintiff Epic Systems Corporation (“Epic”) moves this Court for a protective order on an expedited basis so that Epic will not be required to respond to the counterclaim discovery served by the defendants until after the April 2016 trial on Epic’s claims against TCS. The basis for this motion is more fully set forth in the accompanying memorandum.

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/s/ Rick Richmond

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